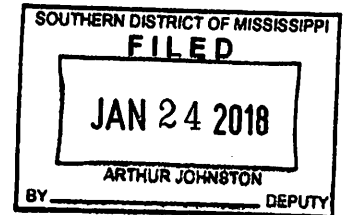


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

WILLIAM M. BROOMFIELD

SUPERSEDING INDICTMENT
CRIMINAL NO. 1:17cr57LG-RHW

18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(d)(1)
18 U.S.C. § 1001

The Grand Jury charges:

COUNT 1

On or about June 15, 2016, in Harrison County in the Southern Division of the Southern District of Mississippi, the defendant, **WILLIAM M. BROOMFIELD**, in connection with his acquisition of two firearms, to wit: a Ruger, Model American, 9mm pistol, serial number 860-22964, and a Romarm/Cugir, Model Draco, 7.62 caliber pistol, serial number DA769215, from a licensee of Cook's Gun Shop Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to said federal licensee, which statement was intended and likely to deceive said licensee with respect to a fact material to the lawfulness of the acquisition of said firearms by the defendant under Chapter 44 of Title 18, in that the defendant answered and represented on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, when in fact, as the defendant then and there well knew, he was not the actual buyer of the firearms, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 2

On or about June 15, 2016, in Harrison County in the Southern Division of the Southern District of Mississippi, the defendant, **WILLIAM M. BROOMFIELD**, knowingly sold two firearms, to wit: a Ruger, Model American, 9mm pistol, serial number 860-22964, and a Romarm/Cugir, Model Draco, 7.62 caliber pistol, serial number DA769215, to T.D.C., knowing and having reasonable cause to believe that T.D.C. had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT 3


On or about July 18, 2017, in Harrison County, in the Southern Division of the Southern District of Mississippi, in a matter within the jurisdiction of the Bureau of Alcohol, Tobacco, Firearms and Explosives, an agency of the United States of America, the defendant, **WILLIAM M. BROOMFIELD**, knowingly and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendant, in an effort to exonerate himself, told Special Agent Kevin Istre and Task Force Officers of the Bureau of Alcohol, Tobacco, Firearms and Explosives, that all of the firearms he had purchased from Cook's Gun Shop, except for what he had returned to Cook's Gun Shop, were stolen from his residence when he left to go to Alaska to work, all in violation of Title 18, United States Code, Section 1001.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described

above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).



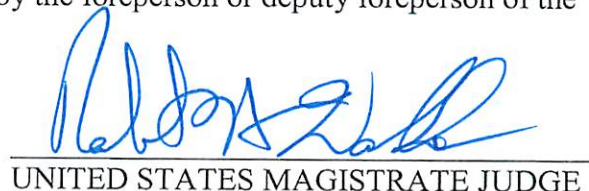
D. MICHAEL HURST, JR.
United States Attorney

A TRUE BILL:

s/signature redacted

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 24th day of January, 2018.



UNITED STATES MAGISTRATE JUDGE